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10 IN THE UNITED STATES BANKRUPTCY COURT
11 CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION
12

13 In re
14 ERIC CONRAD,
15 Debtor.
16

Case No.: 2:21-bk-12802-WB
Chapter 7
Adversary No.: 2:21-ap-01108-WB

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18 **STIPULATION TO EXTEND TIME
TO RESPOND TO COMPLAINT**

19 ERIC CONRAD,
20 Plaintiff,
21 CALIFORNIA DEPARTMENT OF
22 TAX AND FEE ADMINISTRATION,
23 a.k.a., STATE OF CALIFORNIA
24 BOARD OF EQUALIZATION,
25 Defendant(s).

Status Conference

Date: August 24, 2021
Time: 2:00 PM
Judge: Hon. Julia W. Brand
Location: 255 E Temple St., Courtroom
1375, Los Angeles, CA 90012

Pursuant to L.B.R. 9071 and Court Manual Section 4, Plaintiff Eric Conrad (“Plaintiff”) and Defendant California Tax and Fee Administration (“CDTFA”) hereby stipulate and recite as follows:

WHEREAS, on June 16, 2021, Plaintiff filed a Complaint (Adversary Dkt. No. 1) to determine dischargeability of tax liability;

WHEREAS, CDTFA’s current deadline to file a responsive pleading to the Complaint is July 16, 2021;

WHEREAS, due to competing deadlines in other matters, CDTFA requested and Plaintiff agreed to allow CDTFA a two-week extension of time to respond to the Complaint;

WHEREAS, a two-week extension would impose a deadline of July 30, 2021 for CDTFA to respond to the Complaint;

WHEREAS, the Court set a status conference for August 24, 2021;

WHEREAS, the two-week extension of time will not impede the parties’ ability to attend the status conference or file a joint status report.

THE PARTIES HEREBY STIPULATE and jointly request that CDTFA shall have up to and including July 30, 2021 to submit an answer or otherwise respond to Plaintiff’s Complaint. A proposed order is attached.

1 Dated: July 16, 2021

Respectfully submitted,

2 ROB BONTA
3 Attorney General of California
4 BRIAN D. WESLEY
5 Supervising Deputy Attorney General
6 TJ FOX
7 Deputy Attorney General

8 /s/ Brian D. Wesley
9 BRIAN D. WESLEY
10 Supervising Deputy Attorney General
11 *Attorneys for Defendant*
12 *California Department of Tax and Fee*
13 *Administration*

14 Dated: July 16, 2021

15 BRUCE A BOICE
16 Law Office of Boice & Associates

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19 BRUCE A BOICE
20 Law Office of Boice & Associates
21 *Attorney for Plaintiff*
22 *Eric Conrad*

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

600 West Broadway, Suite 1800, San Diego, CA 92101

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION TO EXTEND TIME TO _____**
RESPOND TO COMPLAINT _____

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **JULY 16, 2021**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Attorney for Plaintiff: Bruce A Boice (bboice@lawyer.com)

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) **JULY 16, 2021**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Trustee: Carolyn A Dye (TR), Law Offices of Carolyn Dye, 15030 Ventura Blvd., Suite 527, Sherman Oaks, CA 91403

U.S. Trustee: United States Trustee (LA), 915 Wilshire Blvd., Suite 1850, Los Angeles, CA 90017

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 16, 2021
Date

TJ Fox
Printed Name

/s/ TJ Fox
Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.